portfolios and advice related to financial products. LCG has nothing whatsoever to do with Norca Industrial, LLC ("Norca"), Robert Wren ("Wren"), or any business engaged in the metal industry.

- 3. Primrose Metals, Inc. ("Metals") is an entity that I incorporated to serve as the vehicle for a business venture between me and Wren, focusing on importing metal products. After Metals was incorporated on or about June 8, 2007, a disagreement arose between me and Wren, as a result of which Wren withdrew from the proposed joint business venture. On information and belief, Wren then set up Primrose Alloys, Inc. ("Alloys") as an alternative vehicle for the business venture. Since Wren's withdrawal from the business venture with me, Metals has had nothing whatsoever to do with Norca, Wren, Alloys, or any business engaged in the metal industry. I do not have, and have never had, any ownership or other interest in Alloys.
- 4. I have read the complaint in the action. I generally deny all of the allegations of misconduct that are made by Norca against me, Metals, and LCG. I specifically deny that I have disclosed or used or otherwise misappropriated any trade secret vendor, customer, or other information of Norca. Moreover, I have not communicated with any vendor or customer of Norca.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Palo Alto, California, this July 3, 2007.

RICHARD A. KAYBIN